

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA

**JAMES MICHAEL AMOR**  
**PATRICIA ELVIRA ARMOR**

213 N. Kinzer Ave.  
New Holland, PA 17557

*Plaintiff,*

**vs.**

**COURTNEY CONOVER**

6522 Mason Cir  
Randleman, NC 27317

*Defendant.*

NO. 21-5574

CIVIL ACTION

JURY TRIAL DEMANDED

**PLAINTIFF'S PRETRIAL NARRATIVE STATEMENT**

Plaintiffs, by and through their undersigned counsel, hereby file their Pretrial Narrative Statement pursuant to Eastern District Local Civil Rule 16.1C.1:

**A. STATEMENT OF FACTS TO BE INTRODUCED AT TRIAL**

The Plaintiff, James Michael Amor, is a Doctor of Medical Dentistry with a business practice. (Plaintiff's Complaint ¶5). The co- Plaintiff, Patricia Elvira Amor, is the wife of James Michael Amor. (Plaintiff's Complaint ¶ 6). The Defendant, Courtney Conover, is an adult individual living in North Carolina. (Plaintiff's Complaint ¶ 7). Dr. Amor provides professional dental services to the public. (Plaintiff's Complaint ¶ 8). He was also hired as an independent contractor as the Performance Entertainment Director of the Pittsburgh Renaissance Faire (Faire) in the Summers of 2020 and 2021. (Plaintiff's Complaint ¶ 10). Dr. Amor expects to be employed as the Performance Director of the Pittsburgh Renaissance Faire (Faire) in the Summer of 2023. (Plaintiff's Complaint ¶ 11). He also expects to be employed as a Director of other Fairs around the United States. (Plaintiff's Complaint ¶ 12). The Defendant was a paying guest at the Festival. (Plaintiff's Complaint ¶ 13). Starting in April 2021 and continuing periodically throughout the year, Defendant posted allegations on the Internet accusing Plaintiffs of aiding and abetting

pedophiles and/or rapists. (Plaintiff's Complaint ¶ 14). Defendant wrote that the Plaintiffs refused to take the victims' claims of rape and sexual assault seriously. (Plaintiff's Complaint ¶ 14). Defendant also wrote that Plaintiffs retaliated against these victims by publicly humiliating them and calling them crazy. (Plaintiff's Complaint ¶ 14). Defendant wrote that Plaintiffs retaliated against these victims by calling them crazy, refusing to rehire them and terminating them from employment. (Plaintiff's Complaint ¶¶ 14,15).

On October 30, 2021, Defendant wrote a blog headed 'The Devil Who Rules the Pittsburgh Faire.' (Exhibit P2). Since Dr. Amor had been the Performance Entertainment Director of the Pittsburgh Renaissance Festival, the heading immediately identified him. (Exhibit P2). The second paragraph identified him by name. (Exhibit P2). Defendant wrote that Dr. Amor is the Devil himself. (Exhibit P2). Defendant wrote that Doctor Amor was a human monster. (Exhibit P2). Defendant wrote that Doctor Amor was accused of 'sexual harassment and was vociferously adamant he had merely told "a joke" and therefore innocent of the accusation.' (Exhibit P2). Defendant wrote that a man named Quinn had an infatuation with a 15-year-old girl named Emily. (Exhibit P2). Defendant wrote that by the time they all left the Pittsburgh Renaissance Faire Quinn had been accused of misconduct by a young female cast member who had accused him of making sexual jokes and unwanted advances towards her (Exhibit P2¶ 6). Defendant wrote that Doctor Amor retaliated by attacking the victim for her lies and the victim quit after talking to Doctor Amor and recanted this statement claiming 'I must have misunderstood his intentions. I was young. I am sorry. (Exhibit P2 ¶ 7). Defendant wrote that the victim had nothing to be sorry for and had been vociferously gaslit by Doctor Amor. (Exhibit P2 ¶ 7). Defendant wrote that Kayla (Ms. Miller) accused Quinn of rape but did not go to Doctor Amor immediately. (Exhibit P2 ¶ 9). Defendant

wrote that Ms. Miller wrote during a cast personnel meeting that she would not work with Quinn. (Exhibit P2 ¶ 10).

Defendant wrote that Plaintiff Patricia Amor ‘cruelly told her she was being immature and dramatic and to get over it.’ (Exhibit P2 ¶ 10). Defendant wrote that instead of asking Ms. Miller ‘what could be wrong with this young girl that she acted in such an extreme way, she reacted in a vicious and dismissive manner.’ (Exhibit P2 ¶ 10). Defendant wrote that Patricia Amor was so adamant in her stance she convinced others in the cast that Kayla (Ms. Miller) was merely crazy. (Exhibit P2 ¶ 10). Defendant wrote that when Kayla (Ms. Miller) ‘realized she would not have a choice she screamed “he is a rapist! He raped me! I can’t!” (Exhibit P2 ¶ 10). Defendant wrote that Patricia Amor’s reaction was that she ‘laughed at her. Yes LAUGHED.’ (Exhibit P2 ¶ 10). Defendant wrote that Kayla (Ms. Miller) ‘quit on the spot’. (Exhibit P2 ¶ 10). Defendant wrote that Kayla’s (Ms. Miller’s) reaction ‘was one of being forced to spend time with and relive the trauma of her rape with a rapist’. (Exhibit P2 ¶ 11).

Defendant wrote that the Plaintiff’s ‘treated her with disdain and condescension ‘in she had a clear PTSD reaction. (Exhibit P2 ¶ 11). Defendant wrote that Kayla (Ms. Miller) approached Doctor Amor privately to discuss her accusations against Quinn happen. (Exhibit P2 ¶ 11).

Defendant wrote that Doctor Amor told her she was a liar and would not even begin to entertain her “crazy false accusations.” (Exhibit P2 ¶ 12). Defendant wrote that Doctor Amor told her she was not ‘welcome back on site.’ (Exhibit P2 ¶ 12). Defendant wrote that between 2016-2018 Doctor Amor regularly communicated with Quinn. (Exhibit P2 ¶ 13). Defendant wrote that Quinn spoke to her about sex and sexual fantasies so often that ‘at 15 she sent him her nudes to his cell phone.’ (Exhibit P2 ¶ 13). Defendant wrote that Quinn and Doctor Amor saw these photographs. (Exhibit P2 ¶ 13). Defendant wrote that Quinn said, “Doc always had his back

*“protecting (him) from these insane the girls who always seemed to get all or possessed with him.”*

(Exhibit P2 ¶ 13). Defendant wrote that the ‘same girl was caught by a friend of Quinn and the Pittsburgh cast member making out (at minimum) on the couch of their shared home. The girl had just turned 17. He was 45.’ (Exhibit P2 ¶ 14). Defendant wrote that Quinn rejected her when she turned 18 but spent over a year grooming his next victim. (Exhibit P2 ¶ 14-15). Defendant wrote that Doctor Amor ‘knew about Quinn’s open love for a 15-year-old a decade prior and had been covering up sexual assault allegations.’ (Exhibit P2 ¶ 15). Defendant wrote that Quinn’s potential victim went to another female cast member with a history of being assaulted, who determined that she was being groomed. (Exhibit P2 ¶ 16). Defendant wrote that this cast member went to Doctor Amor in West Virginia to tell him what was happening, and Doctor Amor immediately tried to rebuff her and call her a liar. (Exhibit P2 ¶ 16). Defendant wrote ‘and if it was not for Anne believing her, nothing would have been looked into.’ (Exhibit P2 ¶ 16). Defendant wrote ‘Fortunately, Anne told Doc to let her do the investigation. It caused several fights between the two. Doc was already letting the main cast member of West Virginia know that she’d never work in Pittsburgh because of her accusations of Quinn and that he would make sure of it. He followed through on his threat. (Exhibit P2 ¶ 16). Defendant wrote that the ‘newest girl, unfortunately, was so groomed by that point she refused to say anything to Anne.’ (Exhibit P2 ¶ 17). Defendant wrote that Anne ‘recognize the pattern of behavior, and said she believed he had already started a relationship that was inappropriate there. But she could not prove it.’ (Exhibit P2 ¶ 17). Defendant wrote that Anne blocked Quinn on Facebook and left his band. (Exhibit P2 ¶ 17). Defendant wrote that Quinn’s reaction to a 16-year-old blocking him on Facebook caused him to be depressed and forced him back into drinking. (Exhibit P2 ¶ 18).

Defendant wrote that Quinn contacted Bri (Ms. Kube) to ask her to friend the girl on Facebook so she could report back to him what she was up to. Bri refused. (Exhibit P2 ¶ 18). Defendant wrote that in November, she had spent a week at a hotel with Quinn and told him he, as a 46-year-old man should not be discussing sex or coddling alone with a 16-year-old girl. (Exhibit P2 ¶ 19). Defendant wrote that Doctor Amor refused to fire the previous victim who had let everyone know what newest abuse he was partaking in. (Exhibit P2 ¶ 20). Defendant wrote that Doctor Amor ‘twisted the story to such an extent it was unrecognizable and made himself the victim. And, of course, load of sympathy because no one knew the truth.’ (Exhibit P2 ¶ 20). Defendant continued her article under the title ‘The Aftermath-and More Cover up.’

Defendant wrote that during rehearsals for the Pittsburgh Renaissance Faire, Doctor Amor screamed at the previous female victim in front of the entire cast. (Exhibit P2 ¶ 21). Defendant wrote that Doctor Amor called that victim a liar and crazy. (Exhibit P2 ¶ 21). Defendant wrote that Doctor Amor told the victim that ‘her delusions about Quinn were going to stop.’ (Exhibit P2 ¶ 21). Defendant wrote that Doctor Amor said if ‘she ever wanted to work there again, she’d never bring it up after this.’ (Exhibit P2 ¶ 21). Defendant wrote that Doctor Amor said this in front of the entire cast. (Exhibit P2 ¶ 21). Defendant wrote that she was still on ‘probation’ and any screwup would mean she would be out. (Exhibit P2 ¶ 21). Defendant wrote that the victim ‘fled the room crying’. (Exhibit P2 ¶ 21). Defendant appended a chart called ‘Rape Apologist Bingo.’ (Exhibit 2). Defendant wrote that Michael Menendez sent a written letter to the owner of Pittsburgh Renaissance Faire detailing the abuses Doctor Amor regularly put the casts through and how he needed to be removed from power. (Exhibit P2 ¶ 22). Defendant wrote that nothing happened to Doctor Amor due to Michael Menendez’s letter. (Exhibit P2 ¶ 23). Defendant wrote that Kristy Fertal told Ms. Kube that nothing would be done about Doctor Amor’s ‘as the owner liked him.’

(Exhibit P2 ¶ 23). Defendant wrote that Doctor Amor was like ‘Donald Trump at the Pittsburgh Festival and could murder someone in the lanes, and the owners would still love him. He can do no wrong. Monsters stick together.’ (Exhibit P2 ¶ 23). Defendant wrote that Ms. Kube was terrified that ‘if he said a word she would lose her job.’ (Exhibit P2 ¶ 24). Defendant wrote that Ms. Kube wrote a speech detailing every single account of an accusation openly printed the behavior that Quinn had exhibited in the previous 15 years. (Exhibit P2 ¶ 25). Defendant wrote that there were rumors that Quinn had raped a new teenager, but she was too terrified of Doctor Amor to come forward and admit it openly. (Exhibit P2 ¶ 26). Defendant wrote that Doctor Amor sent out an email of which Ms. Kube still has possession which threatened any cast member who dared to question Ms. Miller about her rape. (Exhibit P2 ¶ 27). Defendant wrote that anyone who speaks to Ms. Miller about her rape or casts are anything would be immediately filed from the Festival. This letter was in red and bold. (Exhibit P2 ¶ 27). Defendant wrote that Doctor Amor has spent so many years covering up the crimes of Quinn he is equally as liable for. (Exhibit P2 ¶ 28). Defendant then wrote ‘too often, abuse is a dirty secret by the abused, where shame and the threat of more abuse are used device silence.’ Defendant wrote that Doctor Amor was going on Facebook to tell people what they could and could not post. (Exhibit P2 ¶ 30). Defendant wrote that Doctor Amor would viciously argue on their pagers and call them names. (Exhibit P2 ¶ 30). Defendant then quoted from Elie Wiesel ‘always take sides. Neutrality helps the oppressor, never the victim. Silence encourages the tormentor never the tormented.’ (Exhibit 2) Defendant wrote that Bri (Ms. Kube) is afraid that Doctor Amor will beat her or kill her, and her fears were not unfounded. (Exhibit P18 ¶ 31). Defendant wrote that Doctor Amor was verbally abusive to his wife, co-plaintiff Patricia Amor. (Exhibit P2 ¶ 33). Defendant wrote that Bri (Ms. Kube) claimed Doctor Amor was physically abusive but less violent than her previous husband. (Exhibit P18 ¶ 33). Defendant wrote

that ‘this is the truth about James “Doc” Amor whether you like it or not.’ (Exhibit P2 ¶ 39). Defendant posted in the same article ‘Evil people rely on the acquiescence of naïve good people to allow them to continue with the evil.’ (Exhibit 2). Defendant later posted that ‘she handed in as evidence Bri’s affidavit, part 2. This includes her illegal firing by Doc.’ (See Exhibit 3 hereto attached and incorporated herein). Defendant added in the same post, referencing Doctor Amor ‘to protect the fragility of the ego, a malignant narcissistic fabricates a carefully thought-out façade of lies and fabrications when you leave them, or when you have seen through them. This campaign is waged against you in the form of a very credible smear campaign. However, in the time the cracks in their story become apparent, you do not even have to wear yourself out emotionally trying to disprove their lives’ (Exhibit 3.) Defendant wrote that Doctor Amor ‘has been aiding and abetting the pedophile for two decades. (Exhibit 3.) Defendant wrote an article headed ‘The Perpetual Victim is actually A criminal’ wherein she describes in detail her own relationship with Quinn. (See Exhibit 4 hereto attached and incorporated herein). Defendant was rejected by Quinn, despite being attracted to him and declined to have a physical relationship with her. (Exhibit 4.) During her relationship with Quinn, Defendant never complained to HR or Doctor Amor about Quinn. (Exhibit 4.) During her relationship with Quinn, Defendant never accused Quinn of rape. (Exhibit 3.) After her relationship with Quinn, Defendant never accused Quinn of pedophilia or sexual assault of a minor. (Exhibit 4.) After her relationship with Quinn, Defendant never until May 2021 ever accused Doctor Amor of covering up rape and pedophilia. (Exhibit 4). Defendant writes in Exhibit 3 that it was Bri who refused to find Quinn’s accusers. (Exhibit 4). Plaintiffs swear they have never retaliated against rape and/or sexual assault victims. (Plaintiff’s affidavits hereto collectively attached as Exhibit 5.) Plaintiffs swear they have never publicly humiliated rape and/or sexual assault victims. (Exhibit 5.) Plaintiffs swear they have never called rape and/or

sexual assault victims crazy. (Exhibit 5.) Plaintiffs swear they have never refused to hire rape and/or sexual assault victims. (Exhibit 5.) Plaintiffs swear they have never terminated rape and/or sexual assault victims from employment. (Exhibit 5.) Plaintiffs swear they have never abetted pedophiles. (Exhibit 5) Plaintiffs swear they have never abetted rapists. (Exhibit 5). Plaintiffs swear they have never refused to take the claims of rape and sexual assault victims seriously. (Exhibit 5) Defendant does not know how many people read her blog about the Plaintiffs. Deposition of Defendant, hereto attached and incorporated as (Exhibit 6, page 17: line 9-11.) Defendant never spoke to the Plaintiffs to ask whether the information in her blog was accurate. (Id at 21:4-6.) Defendant has no direct knowledge of complaints against the Plaintiffs. (Id at 20:6-8). Defendant has never experienced any threatening behavior or violence on the part of Plaintiffs. (Id at her 21:25-22:7). Ms. Kube did not give the Defendant permission to write about her experiences. (Id at. 22:18-19.) In addition to posting her blog, Defendant posted information about Doctor Amor on her personal page to 63 individuals. (Id at 24:8-14.) Defendant justified her personal postings on the basis that 'it is not published' but are 'private posts. (Id at 25:11-15). Defendant does not know whether the content of her blog and personal postings regarding the Plaintiffs are accurate. (Id at 28:1-5.) Defendant admits that her posting, accusing Doctor Amor of being a conspirator in pedophilia, sexual abuse, or rape is a very, very damaging accusation. (Id at 30:4-7.) Defendant posted the accusation that Doctor Amor was a conspirator in pedophilia, sexual abuse, or rape because it was damaging to him. (Id at 30:8-9.) Defendant admits that such accusations, whether true or not, could affect Doctor Amor professionally in his career as a dentist. (Id at 30:10-20.) Defendant admits that such accusations, whether true or not, could affect Doctor Amor in his position at the Pittsburgh Renaissance Faire and other Renaissance Faires (Id at 30: 21-25.) Defendant published the accusations because, in her opinion, it was an issue of public



concern. (Id at 32:13-16). Defendant admits that despite all of her alleged corroborative information she did not go to the police to accuse Doctor Amor of covering up criminal activity and being a conspirator in rape, pedophilia and sexual harassment. (Id at 36:19-37:22.) Defendant testified that the only thing she was accusing him of was keeping quiet and not notifying the authorities about rape and pedophilia. (Id at 37:23-38:3.) Defendant states that she was not accusing Doctor Amor of pedophilia; she was accusing Quinn of rape and pedophilia. (Id at 37:23-38:1.) Defendant alleges she did not go to the police regarding Quinn because she believed two years was the statute of limitations and did not have the actual evidence. (Id at 39:6-14.).

Defendant admits that despite not having the actual evidence she wrote about Doctor Amor in the article ‘the Devil who rules the Pittsburgh Faire.’ (Id at 39:15-17.) Defendant admits that she found out about the alleged allegations against Quinn and Doctor Amor at the end of December 2019 but did not publish her blog until 2 years later. (Id at 39:21-40:12.) Defendant stated that an allegation as serious as rape could not be ignored. (Id at 53:20-54:4.) Defendant admits that the identity of the rape victim was never disclosed. (Id at 54:6-9). Defendant admits that the rape cannot be investigated if the rape victim was never disclosed. (Id at 54:10-13.) Defendant agrees that Doctor Amor could not investigate the rape if the victim were not disclosed. (Id at 55:2-9.) Plaintiffs have suffered economic loss as a consequence of Defendant’s actions (P 14) Plaintiffs will testify about their emotional damages.

## **B. STATEMENT OF DAMAGES CLAIMED**

Plaintiff is seeking the following damages:

- Legal Fees in excess of \$75000.
- Expenses directly related to the prosecution of this case are \$1,754.49 consisting of filing fees, deposition and detective services to locate the Defendant.

- Pain and suffering in an amount to be determined by the jury.
- Lost Revenue. 150 of Dr. Amor's patients have a crossover to the Renaissance festival. Offers to purchase Dr. Amor's dental practice were dramatically withdrawn. Instead of selling for \$175,000, it instead sold for \$55,000 and Plaintiff spent \$8500 emptying it of equipment which he was unable to sell.
- Dr. Amor had a revenue loss of \$25,000 from 2021- 2022 which he attributes to Defendant's defamation. Plaintiffs have attached an exhibit of a profit and loss statement from January through May 2022 it shows a loss of \$14,940.68
- Loss of income by Dr. Amor tracking and researching Defendant's defamatory publications when that time could have been spent in dentistry, as a locum tenens at \$100 an hour. Dr. Amor calculates his loss at around \$36,000.
- Punitive damages in an amount to be determined by a jury.

**C. WITNESS LIST**

**a. James Amor**

*Under the custody and control of Plaintiff's attorney. Will testify to the falsity of Defendant's defamatory publications and the damages he has suffered.*

**b. Patricia Amor**

*Under the custody and control of Plaintiff's attorney. Will testify to the falsity of Defendant's defamatory publications and the damages she has suffered.*

**c. Courtney Conover**

*As on Cross.*

**d. Lois Beidler: 3217 Stoudts Ferry Bridge Road, Reading, PA 19605**

(610) 781 – 1256 [iszadance@yahoo.com](mailto:iszadance@yahoo.com)

*Will testify as to the falsity of Defendant's publications.*

e. **Scott Walton:**

225 Morewood Avenue, Blairsville, PA 15717 (724) 454-0205  
scott.walton1@yahoo.com

*Will testify as to the falsity of Defendant's publications*

f. **Randal Scott Lefkowitz:**

212 Washington Street, Munhall, PA 15120

*Will testify to Defendant's lack of credibility*

g. **Leonard Miller:**

189 Archertown Rd, New Egypt, NJ 08533 (215) 499-0105 tj\_miller@hotmail.com

*Will testify regarding the falsity of Defendant's publications*

h. **Chelsea Charlesworth:**

310 Cedarhurst Avenue, N.Versailles, PA 15137 412-251-2236 chelseasweetpea@gmail.com

*Will testify regarding the falsity of Defendant's publications.*

i. **Christine Manns**

6810 Vera Drive Pittsburgh PA 15236 (412) 377-7300 clrauch@hotmail.com.

*Will testify as to the falsity of Defendant's publications*

j. **Brianna Kube**

741 Florence Avenue, Apt B. Pittsburgh, PA 15202 717 380 4761

*Will testify to the falsity of Defendant's allegations against Plaintiffs*

Plaintiff also reserves the right to call any witnesses listed by Defendant.

**A. STIPULATIONS**

None.

**B. DEPOSITION DESIGNATIONS**

By way of disclosure Plaintiffs may use the following sections of Defendant's deposition.

Page. 13: line 14 – page 59 line 9.

**LIST OF EXHIBITS**

Plaintiffs also reserve the right to utilize any exhibits listed by Defendant. Plaintiffs reserves the right to seek to leave to amend this list to the extent consistent with the Federal Rules of Civil Procedure, the Local Rules of the United States District Court for Eastern District of Pennsylvania and the policies and procedures of this Court.

**Exhibit 1** – Screenshot of Defendant’s Facebook Page

**Exhibit 2** - Defendant’s Blog titled “*The Devil Who Rules the Pittsburgh Faire*” dated October 30, 2021.

**Exhibit 3** - Defendant’s Blog titled “*The Perpetual Victim is Actually a Criminal*” dated April 6, 2021.

**Exhibit 4** – Defendant’s Blog titled “*The Narcissistic Duelist*” dated May 22, 2021.

**Exhibit 5** – Defendant’s Blog titled “*The Manipulator Extraordinaire and Me*” dated April 3, 2021.

**Exhibit 6** – Screenshots of Defendant’s Conversation with Lily.

**Exhibit 7**- Screenshot of Defendant’s Facebook Post.

**Exhibit 8** –Docket Report Highlighting Court’s Order Denying Motion for Temporary Restraining Order as Moot (ECF 33, 04/13/2022).

**Exhibit 9** – Screenshot of Defendant’s Facebook Post.

**Exhibit 10** – Screenshot of Defendant’s Facebook Page with Comments.

**Exhibit 11**- Pittsburgh Renaissance Faire Acting Company Sexual Harassment Protocol.

**Exhibit 12** - Pittsburgh Renaissance Faire Acting Company General Code of Conduct.

**Exhibit 13** - Pittsburgh Renaissance Faire Acting Company Code of Conduct between Doc Amor, Patti Amor and the Cast.

**Exhibit 14** – Profit and Loss Comparison Report of New Design Dental Associates.

**Exhibit 15** – Defendant’s Blog Post titled “*The Narcissistic Duelist*” dated May 22, 2021.

**Exhibit 16** – Defendant’s Blog Post titled “*The Gaslighting Champion (The Perpetual Victim is Actually a Criminal II)*” dated November 27, 2021.

**Exhibit 17** – Defendant’s Blog Post titled “*That Guy is Toxic and High Off His Own Farts*” dated February 20, 2022.

**Exhibit 18** – Plaintiffs’ Complaint (ECF 2, December 30, 2021).

**Exhibit 19** – Plaintiff’s Pretrial Narrative Statement.

**C. OUTSTANDING LEGAL ISSUES TO BE ADDRESSED AT THE FINAL PRE-TRIAL CONFERENCE**

The permission to bring in Dana Freedman live via video or prerecorded.

**D. EXPERT DISCLOSURES**

The parties have not utilized experts in this case.

**E. REPORTS OF TREATING PHYSICIANS**

Not applicable in this case.

**I. TRIAL TIME**

Plaintiff anticipates two (2) days to put on her case in chief and estimates the entire trial should take four (4) days.

Respectfully Submitted,

KOLMAN LAW, P.C.

/s/ Timothy M. Kolman

Timothy M. Kolman, Esquire  
414 Hulmeville Ave  
Pennel, PA 19047  
(215) 750-3134  
Attorney for Plaintiff

Dated: 10/11/2022

**CERTIFICATE OF SERVICE**

I, Timothy M. Kolman, Esquire, do hereby certify that on this 11<sup>th</sup> day of October, 2022, I caused a true and correct copy of Plaintiff's Pretrial Memo to be served upon the following via ECF:

Courtney Conover  
*Pro Se Defendant*

Respectfully Submitted,

KOLMAN LAW, P.C.

/s/ Timothy M. Kolman

Timothy M. Kolman, Esquire  
414 Hulmeville Ave  
Penn del, PA 19047  
(215) 750-3134  
Attorney for Plaintiff

Dated: 10/11/2022